

Exhibit 4

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE BIOPURE CORPORATION) Master Docket No. 1:03-CV-12628 (NG)
SECURITIES LITIGATION)
)
) Assigned to Judge Nancy Gertner
)

**BIOPURE CORPORATION'S NOTICE OF
DEPOSITION OF EMILY A. BITTMAN**

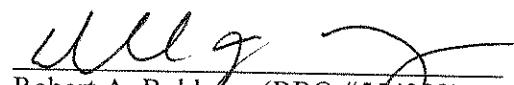
PLEASE TAKE NOTICE THAT, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant Biopure Corporation will take the deposition upon oral examination of Plaintiff Emily A. Bittman on June 6, 2006 at 10:00 a.m., at the offices of Bingham McCutchen LLP, 150 Federal Street, Boston, Massachusetts 02110, before a notary public or other officer authorized by law to administer oaths. The deposition will be recorded stenographically and will continue from day to day until completed.

You are invited to attend and cross-examine.

Dated May 15, 2006

BIOPURE CORPORATION,

By its attorneys,

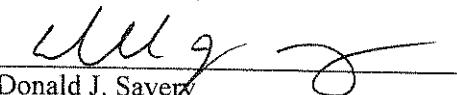

Robert A. Buhlman (BBO #554393)
Donald J. Savery (BBO #564975)
Michael Blanchard (BBO #636860)
BINGHAM McCUTCHEN LLP
150 Federal Street
Boston, MA 02110-1276
(617) 951-8000

Counsel for Defendant Biopure
Corporation

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2006, I caused a true copy of the foregoing Notice of Deposition of Emily A. Bittman to be served by facsimile and mail upon Edward F. Haber, Esq., Shapiro, Haber & Urmy LLP, Exchange Place, 53 State Street, Boston, MA 02109.

Dated: May 15, 2006


Donald J. Savery

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE BIOPURE CORPORATION) Master Docket No. 1:03-CV-12628 (NG)
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**BIOPURE CORPORATION'S NOTICE OF
DEPOSITION OF STUART GOTTLIEB**

PLEASE TAKE NOTICE THAT, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant Biopure Corporation will take the deposition upon oral examination of Plaintiff Stuart Gottlieb on June 8, 2006 at 10:00 a.m., at the offices of Bingham McCutchen LLP, 150 Federal Street, Boston, Massachusetts 02110, before a notary public or other officer authorized by law to administer oaths. The deposition will be recorded stenographically and will continue from day to day until completed.

You are invited to attend and cross-examine.

Dated May 15, 2006

BIOPURE CORPORATION,

By its attorneys,



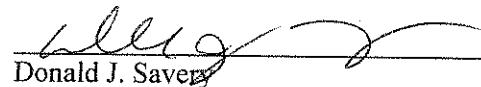
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Counsel for Defendant Biopure
Corporation

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2006, I caused a true copy of the foregoing Notice of Deposition of Stuart Gottlieb to be served by facsimile and mail upon Edward F. Haber, Esq., Shapiro, Haber & Urmy LLP, Exchange Place, 53 State Street, Boston, MA 02109.

Dated: May 15, 2006


Donald J. Saver